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10  
11 **IN THE UNITED STATES DISTRICT COURT**  
12 **FOR THE DISTRICT OF ARIZONA**

11 United States of America,	) 4:23-cr-02251-JAS-LCK-1
	)
12 Plaintiff,	)
13 vs.	) <b>MOTION TO EXTEND PLEA</b>
	) <b>DEADLINE &amp; CONTINUE TRIAL</b>
14 John Turscak,	) (Tenth Request for Defendant)
	) (First Request for counsel Dan Cooper and
15 Defendant.	) Amy Krauss)
	)
16	)

17 COMES NOW the Defendant, John Turscak, through counsel undersigned,  
18 hereby moves this Court for an extension of the plea deadline and continuance of  
19 the trial date. The trial is currently set for December 30, 2025 at 9:30 a.m. The plea  
20 deadline is currently set for December 12, 2025.

21  
22 The reason for this request is that counsel is new to the case. There are over  
23 2800 pages of disclosure and other issues that need to be addressed, and we are in  
24 the middle of wading through the disclosure and will need more time to finish. At  
25 this time counsel needs additional time to review materials disclosed, to obtain  
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1 additional records, to conduct follow-up investigation, and engage in plea  
2 discussions with the government.

3  
4 In the event a non-trial disposition cannot be reached, counsel will need  
5 additional time to prepare pretrial motions and for trial defense.

6 Pursuant to Local Civil Rule 7.3(b), undersigned counsel has discussed the  
7 request to continue with Matthew Cassell, and the Government does not oppose this  
8 request.  
9

10 Wherefore, undersigned counsel respectfully requests that the trial be reset in  
11 approximately ninety (90) days. It is expected that excludable delay under Title 18  
12 U.S.C. § 3161(h)(7)(A) will occur as a result of this motion or from an order based  
13 thereon. See Local Criminal Rule 12.2(a).  
14

15 RESPECTFULLY SUBMITTED this 15th day of December, 2025.

16  
17 By s/ Dan H. Cooper  
18 Dan H. Cooper  
19 Attorney for Defendant Turscak

20 By s/ Amy Krauss  
21 Amy B. Krauss  
22 Attorney for Defendant Turscak

23 **CERTIFICATE OF SERVICE**

24 This document was electronically transmitted to the Clerk's Office using the  
25 CM/ECF System for filing, which provided service to all registered case participants.  
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